



STEPHANIE S. CHRISTENSEN
Acting United States Attorney
SCOTT M. GARRINGER
Assistant United States Attorney
Chief, Criminal Division
KATHY YU (Cal. Bar No. 268210)
SCOTT M. LARA (Cal. Bar No. 296944)
Assistant United States Attorneys
Violent and Organized Crime Section
1300 United States Courthouse
312 North Spring Street
Los Angeles, California 90012
Telephone: (213) 894-2431/0427
E-mail: kathy.yu@usdoj.gov
scott.lara@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

FRANCISCO ANTHONY DORAME,
aka "dadboss99,"
aka "SEXYCONN,"

Defendant.

No. CR 2:22-cr-00428-SPG

PLEA AGREEMENT FOR DEFENDANT
FRANCISCO ANTHONY DORAME

1. This constitutes the plea agreement between FRANCISCO ANTHONY DORAME ("defendant") and the United States Attorney's Office for the Central District of California (the "USAO") in the above-captioned case. This agreement is limited to the USAO and cannot bind any other federal, state, local, or foreign prosecuting, enforcement, administrative, or regulatory authority.

DEFENDANT'S OBLIGATIONS

2. Defendant agrees to:

1 a. Gives up the right to indictment by a grand jury and,
2 at the earliest opportunity requested by the USAO and provided by the
3 Court, appear and plead guilty to a two-count Information, in the
4 form attached to this agreement as Exhibit A or a substantially
5 similar form, which charges defendant with one count of attempted sex
6 trafficking of a child, in violation of Title 18, United States Code,
7 Sections 1594(a), 1591(a)(1), (b)(1), and one count of distribution
8 of child sex abuse material, in violation of Title 18, United States
9 Code, Sections 2252A(a)(2)(A), (b)(1).

10 b. Not contest facts agreed to in this agreement.

11 c. Abide by all agreements regarding sentencing contained
12 in this agreement.

13 d. Appear for all court appearances, surrender as ordered
14 for service of sentence, obey all conditions of any bond, and obey
15 any other ongoing court order in this matter.

16 e. Not commit any crime; however, offenses that would be
17 excluded for sentencing purposes under United States Sentencing
18 Guidelines ("U.S.S.G." or "Sentencing Guidelines") § 4A1.2(c) are not
19 within the scope of this agreement.

20 f. Be truthful at all times with the United States
21 Probation and Pretrial Services Office and the Court.

22 g. Pay the applicable special assessments at or before
23 the time of sentencing unless defendant has demonstrated a lack of
24 ability to pay such assessments.

25 h. Agree to and not oppose the imposition of a term of
26 supervised release of at least 20 years under the following
27 conditions of probation or supervised release:
28

1 i. Defendant shall register as a sex offender, and
2 keep the registration current, in each jurisdiction where defendant
3 resides, where defendant is an employee, and where defendant is a
4 student, to the extent the registration procedures have been
5 established in each jurisdiction. When registering for the first
6 time, defendant shall also register in the jurisdiction in which the
7 conviction occurred if different from defendant's jurisdiction of
8 residence. Defendant shall provide proof of registration to the
9 Probation Officer within three days of defendant's placement on
10 probation/release from imprisonment.

11 ii. Defendant shall participate in a psychological
12 counseling and/or psychiatric treatment and/or a sex offender
13 treatment program, which may include inpatient treatment upon order
14 of the Court, as approved and directed by the Probation Officer.
15 Defendant shall abide by all rules, requirements, and conditions of
16 such program, including submission to risk assessment evaluations and
17 physiological testing, such as polygraph and Abel testing, but the
18 defendant retains the right to invoke the Fifth Amendment. The
19 Probation Officer shall disclose the presentence report and/or any
20 previous mental health evaluations or reports to the treatment
21 provider.

22 iii. As directed by the Probation Officer, defendant
23 shall pay all or part of the costs of treating defendant's
24 psychological/psychiatric disorder(s) to the aftercare contractor
25 during the period of community supervision, pursuant to 18 U.S.C.
26 § 3672. Defendant shall provide payment and proof of payment as
27 directed by the Probation Officer.

1 iv. Defendant shall not view or possess any
2 materials, including pictures, photographs, books, writings,
3 drawings, videos, or video games, depicting and/or describing child
4 pornography, as defined in 18 U.S.C. § 2256(8), or sexually explicit
5 conduct depicting minors, as defined at 18 U.S.C. § 2256(2). The
6 defendant shall not possess or view any materials such as videos,
7 magazines, photographs, computer images or other matter that depicts
8 "actual sexually explicit conduct" involving adults as defined by 18
9 U.S.C. § 2257(h)(1). This condition does not prohibit defendant from
10 possessing materials solely because they are necessary to, and used
11 for, a collateral attack, nor does it prohibit defendant from
12 possessing materials prepared and used for the purposes of
13 defendant's Court-mandated sex offender treatment, when defendant's
14 treatment provider or the probation officer has approved of
15 defendant's possession of the materials in advance.

16 v. Defendant shall not associate or have verbal,
17 written, telephonic, or electronic communication with any person
18 under the age of 18, except: (a) in the presence of the parent or
19 legal guardian of said minor; and (b) on the condition that defendant
20 notifies said parent or legal guardian of defendant's conviction in
21 the instant offenses. This provision does not encompass persons
22 under the age of 18, such as waiters, cashiers, ticket vendors, etc.,
23 with whom defendant must interact in order to obtain ordinary and
24 usual commercial services.

25 vi. Defendant shall not frequent, or loiter, within
26 100 feet of school yards, parks, public swimming pools, playgrounds,
27 youth centers, video arcade facilities, or other places primarily
28 used by persons under the age of 18.

1 vii. Defendant shall not affiliate with, own, control,
2 volunteer or be employed in any capacity by a business or
3 organization that causes defendant to regularly contact persons under
4 the age of 18.

5 viii. Defendant shall not affiliate with, own,
6 control, or be employed in any capacity by a business whose principal
7 product is the production or selling of materials depicting or
8 describing "sexually explicit conduct," as defined at 18 U.S.C.
9 § 2256(2).

10 ix. Defendant shall not own, use or have access to
11 the services of any commercial mail-receiving agency, nor shall
12 defendant open or maintain a post office box, without the prior
13 written approval of the Probation Officer.

14 x. Defendant's employment shall be approved by the
15 Probation Officer, and any change in employment must be pre-approved
16 by the Probation Officer. Defendant shall submit the name and
17 address of the proposed employer to the Probation Officer at least
18 ten days prior to any scheduled change.

19 xi. Defendant shall not reside within direct view of
20 school yards, parks, public swimming pools, playgrounds, youth
21 centers, video arcade facilities, or other places primarily used by
22 persons under the age of 18. Defendant's residence shall be approved
23 by the Probation Officer, and any change in residence must be pre-
24 approved by the Probation Officer. Defendant shall submit the
25 address of the proposed residence to the Probation Officer at least
26 ten days prior to any scheduled move.

27 xii. Defendant shall submit defendant's person, and
28 any property, house, residence, vehicle, papers, computer, other

1 electronic communication or data storage devices or media, and
2 effects to search at any time, with or without warrant, by any law
3 enforcement or Probation Officer with reasonable suspicion concerning
4 a violation of a condition of probation/supervised release or
5 unlawful conduct by defendant, and by any Probation Officer in the
6 lawful discharge of the officer's supervision function.

7 xiii. Defendant shall possess and use only those
8 computers and computer-related devices, screen user names, passwords,
9 email accounts, and internet service providers ("ISPs") that have
10 been disclosed to the Probation Officer upon commencement of
11 supervision. Any changes or additions are to be disclosed to the
12 Probation Officer prior to defendant's first use. Computers and
13 computer-related devices include personal computers, personal data
14 assistants ("PDAs"), internet appliances, electronic games, cellular
15 telephones, and digital storage media, as well as their peripheral
16 equipment, that can access, or can be modified to access, the
17 internet, electronic bulletin boards, and other computers.

18 xiv. All computers, computer-related devices, and
19 their peripheral equipment, used by defendant shall be subject to
20 search and seizure. This shall not apply to items used at the
21 employment's site that are maintained and monitored by the employer.

22 xv. Defendant shall comply with the rules and
23 regulations of the Computer Monitoring Program. Defendant shall pay
24 the cost of the Computer Monitoring Program, in an amount not to
25 exceed \$32 per month per device connected to the internet.

26 i. Not seek the discharge of any restitution obligation,
27 in whole or in part, in any present or future bankruptcy proceeding.

28

THE USAO'S OBLIGATIONS

3. The USAO agrees to:

a. Not contest facts agreed to in this agreement.

b. Abide by all agreements regarding sentencing contained in this agreement.

c. At the time of sentencing, provided that defendant demonstrates an acceptance of responsibility for the offenses up to and including the time of sentencing, recommend a two-level reduction in the applicable Sentencing Guidelines offense level, pursuant to U.S.S.G. § 3E1.1, and recommend and, if necessary, move for an additional one-level reduction if available under that section.

d. At the time of sentencing, provided that defendant demonstrates an acceptance of responsibility for the offenses up to and including the time of sentencing, recommend no higher than 240-months' imprisonment, and a lifetime period of supervised release.

NATURE OF THE OFFENSES

4. Defendant understands that for defendant to be guilty of the crime charged in count one, that is, sex trafficking of a child, in violation of Title 18, United States Code, Sections 1594(a), 1591(a)(1), (b)(1), the following must be true: (1) defendant attempted to knowingly recruit, entice, harbor, transport, provide, obtain, maintain, patronize, or solicit by any means a person; (2) defendant knew that the person had not yet attained 14 years of age and would be caused to engage in a commercial sex act; and (3) defendant's actions were in or affected interstate or foreign commerce.

5. Defendant understands that for defendant to be guilty of the crime charged in count two, that is, distribution of child sex

1 abuse material, in violation of Title 18, United States Code,
2 Sections 2252A(a)(2)(A), (b)(1), the following must be true:

3 (1) defendant knowingly distributed matters which the defendant knew
4 contained visual depictions of minors engaged in sexually explicit
5 conduct; (2) defendant knew the visual depiction contained in the
6 matters showed a minor engaged in sexually explicit conduct; (3)
7 defendant knew that production of such a visual depiction involved
8 use of a minor in sexually explicit conduct; and (4) each visual
9 depiction had been: (a) mailed, shipped, or transported using any
10 means or facility of interstate commerce or in or affecting
11 interstate commerce, or (b) produced using any means or facility of
12 interstate or foreign commerce or shipped or transported in or
13 affecting interstate or foreign commerce by any means, including by
14 computer.

15 PENALTIES AND RESTITUTION

16 6. Defendant understands that the statutory maximum sentence
17 that the Court can impose for a violation of Title 18, United States
18 Code, Sections 1594(a), 1591(a)(1), (b)(1): is: life imprisonment; a
19 lifetime period of supervised release; a fine of \$250,000 or twice
20 the gross gain or gross loss resulting from the offense, whichever is
21 greatest; and a mandatory special assessment of \$100.

22 7. Defendant understands that the statutory mandatory minimum
23 sentence that the Court must impose for a violation of Title 18,
24 United States Code, Sections 1591(a)(1), (b)(1), is: 15 years'
25 imprisonment; 5 years' supervised release; and a mandatory special
26 assessment of \$100.

27 8. Defendant understands that the statutory maximum sentence
28 that the Court can impose for a violation of Title 18, United States

1 Code, Sections 2252A(a)(2)(A), (b)(1), is: 20 years' imprisonment; a
2 lifetime period of supervised release; a fine of \$250,000 or twice
3 the gross gain or gross loss resulting from the offense, whichever is
4 greatest; and a mandatory special assessment of \$100.

5 9. Defendant understands that the statutory mandatory minimum
6 sentence that the Court must impose for a violation of Title 18,
7 United States Code, Sections 2252A(a)(2)(A), (b)(1), is: five years'
8 imprisonment; a five-year period of supervised release; and a
9 mandatory special assessment of \$100.

10 10. Defendant understands, therefore, that the total maximum
11 sentence for all offenses to which defendant is pleading guilty is:
12 lifetime imprisonment; a lifetime period of supervised release; a
13 fine of \$500,000 or twice the gross gain or gross loss resulting from
14 the offenses, whichever is greatest; and a mandatory special
15 assessment of \$200.

16 11. Defendant understands that, pursuant to the Justice for
17 Victims of Trafficking Act of 2015, the Court shall impose an
18 additional \$5,000 special assessment if the Court concludes that
19 defendant is a non-indigent person, to be paid after defendant's
20 other financial obligations have been satisfied.

21 12. Defendant understands that, pursuant to the Amy, Vicky, and
22 Andy Child Pornography Victim Assistance Act of 2018 found in 18
23 U.S.C. § 2259A, the Court may impose an additional assessment of up
24 to \$50,000.

25 13. Defendant understands and agrees that pursuant to Title 18,
26 United States Code, Section 2259, defendant will be required to pay
27 full restitution to the victims of the offenses to which defendant is
28 pleading guilty. Defendant agrees that, in return for the USAO's

1 compliance with its obligations under this agreement, the Court may
2 order restitution to persons other than the victims of the offenses
3 to which defendant is pleading guilty. In particular, defendant
4 agrees that the Court may order restitution to any victim of any of
5 the following for any losses suffered by that victim as a result of
6 any relevant conduct, as defined in U.S.S.G. § 1B1.3, in connection
7 with the offenses to which defendant is pleading guilty. The
8 restitution amount is unknown at this juncture, and the parties
9 recognize and agree that this amount could change based on facts that
10 come to the attention of the parties prior to sentencing, in
11 particular, the government's ongoing investigation.

12 14. Defendant understands that supervised release is a period
13 of time following imprisonment during which defendant will be subject
14 to various restrictions and requirements. Defendant understands that
15 if defendant violates one or more of the conditions of any supervised
16 release imposed, defendant may be returned to prison for all or part
17 of the term of supervised release authorized by statute for the
18 offenses that resulted in the term of supervised release.

19 15. Defendant understands that as a condition of supervised
20 release, under Title 18, United States Code, Section 3583(d),
21 defendant will be required to register as a sex offender. Defendant
22 understands that independent of supervised release, he will be
23 subject to federal and state registration requirements, for a
24 possible maximum term of registration up to and including life.
25 Defendant further understands that, under Title 18, United States
26 Code, Section 4042(c), notice will be provided to certain law
27 enforcement agencies upon his release from confinement following
28 conviction.

1 16. Defendant understands that, by pleading guilty, defendant
2 may be giving up valuable government benefits and valuable civic
3 rights, such as the right to vote, the right to possess a firearm,
4 the right to hold office, and the right to serve on a jury.
5 Defendant understands that he is pleading guilty to a felony and that
6 it is a federal crime for a convicted felon to possess a firearm or
7 ammunition. Defendant understands that the conviction in this case
8 may also subject defendant to various other collateral consequences,
9 including but not limited to revocation of probation, parole, or
10 supervised release in another case and suspension or revocation of a
11 professional license. Defendant understands that unanticipated
12 collateral consequences will not serve as grounds to withdraw
13 defendant's guilty plea.

14 17. Defendant and his counsel have discussed the fact that, and
15 defendant understands that, if defendant is not a United States
16 citizen, the conviction in this case makes it practically inevitable
17 and a virtual certainty that defendant will be removed or deported
18 from the United States. Defendant may also be denied United States
19 citizenship and admission to the United States in the future.
20 Defendant understands that while there may be arguments that
21 defendant can raise in immigration proceedings to avoid or delay
22 removal, removal is presumptively mandatory and a virtual certainty
23 in this case. Defendant further understands that removal and
24 immigration consequences are the subject of a separate proceeding and
25 that no one, including his attorney or the Court, can predict to an
26 absolute certainty the effect of his conviction on his immigration
27 status. Defendant nevertheless affirms that he wants to plead guilty
28

1 regardless of any immigration consequences that his plea may entail,
2 even if the consequence is automatic removal from the United States.

3 FACTUAL BASIS

4 18. Defendant admits that defendant is, in fact, guilty of the
5 offenses to which defendant is agreeing to plead guilty. Defendant
6 and the USAO agree to the statement of facts provided below and agree
7 that this statement of facts is sufficient to support pleas guilty
8 to the charge described in this agreement and to establish the
9 Sentencing Guidelines factors set forth below but is not meant to be
10 a complete recitation of all facts relevant to the underlying
11 criminal conduct or all facts known to either party that relate to
12 that conduct.

13 From a date unknown and continuing through May 8, 2022, in the
14 Central District of California, defendant, using Kik (a social media
15 platform utilizing the Internet and interstate commerce) attempted to
16 traffic two minor children, ages seven ("Victim 1") and nine ("Victim
17 2," collectively the "Victims") respectively - knowing that they had
18 not yet attained 14 years of age. In the course of this Kik
19 conversation, defendant made two payments, totaling \$100, to the
20 person who had access to these Victims. Among other things,
21 defendant requested photographs of the Victims, expressed his desire
22 to "play with them right away" upon meeting up, and set a specific
23 date, time, and location for the meeting. Defendant also obtained
24 photographs of these Victims allowing defendant a reasonable
25 opportunity to observe that they were under the age of 14 years old.

26 From a date unknown and continuing through April 2022, defendant
27 knowingly distributed matters that defendant knew constituted child
28 pornography through his Kik account. Agents found messages wherein

1 defendant, using the username "dadboss99," distributed child
2 pornography in exchange for receiving valuable consideration, namely,
3 other child pornography. For example, on or about April 10, 2022,
4 defendant, using the username "dadboss99" shared three child sex
5 abuse images to a Kik chatroom named "DAU/NIEC Sharing, meaning
6 "Daughter/niece" sharing. Those images depicted the following:

- 7 • An approximately four to six-year-old female on a couch with
8 her buttocks spread and an erect penis being inserted into
9 the child victim's anus.
- 10 • An approximately four to six-year-old female on a couch with
11 her legs spread showing her exposed vagina and anus.
- 12 • A four- to six-year-old female on a couch with her buttocks
13 spread. A second image is overlaid and depicts an erect
14 penis being inserted into what appears to be the same minor
15 victim's anus.

16 Separately, on April 12, 2022, an undercover agent messaged
17 defendant on Kik and said "[h]ot pics are u active," to which
18 defendnat responded "trade," acknowledging that he wished to share
19 images with the undercover agent in trade for child sexual abuse
20 images to be provided by the undercover agent, which defendant admits
21 is valuable consideration. Then, defendant sent five more images of
22 child sex abuse material. Those images depicted the following:

- 23 • A four- to six-year-old female bent over with an adult hand
24 holding her pants to expose her buttocks and vagina.
- 25 • A four- to six-year-old female laying on her back with her
26 vagina exposed.
- 27 • A compilation of 12 depictions in one image, showing an erect
28 penis being inserted into a prepubescent vagina.

- 1 • A four- to six-year-old female on a couch with her legs
2 spread showing her exposed vagina and anus.
- 3 • A four- to six-year-old female on a couch with her buttocks
4 spread. A second image is overlaid and depicts an erect
5 penis being inserted into what appears to be the same minor
6 victim's anus.

7 Defendant admits and agrees that he knew the images and videos
8 that he distributed contained visual depictions of minors engaging in
9 sexually explicit conduct, and that he knew that production of such
10 visual depictions involved use of minors engaged in sexually explicit
11 conduct. Some of the images depicted minor victims under the age of
12 12 being used for sexual acts.

13 Defendant admits and agrees that the children depicted in the
14 child pornography images and videos are real children, and defendant
15 downloaded the images and videos from the Internet, which is a means
16 and facility of interstate and foreign commerce, using a computer and
17 interactive computer service (Kik and other social media platforms).

18 SENTENCING FACTORS

19 19. Defendant understands that in determining defendant's
20 sentence the Court is required to calculate the applicable Sentencing
21 Guidelines range and to consider that range, possible departures
22 under the Sentencing Guidelines, and the other sentencing factors set
23 forth in 18 U.S.C. § 3553(a). Defendant understands that the
24 Sentencing Guidelines are advisory only, that defendant cannot have
25 any expectation of receiving a sentence within the calculated
26 Sentencing Guidelines range, and that after considering the
27 Sentencing Guidelines and the other § 3553(a) factors, the Court will
28 be free to exercise its discretion to impose any sentence it finds

appropriate between the mandatory minimum and the maximum set by statute for the crime of conviction.

20. Defendant and the USAO agree to the following applicable Sentencing Guidelines factors:

Count One		
Base Offense Level:	34	U.S.S.G. § 2G1.3(a) (1)
Use of Computer or Interactive Computer Service	+2	U.S.S.G. § 2G1.3(b) (3)
Count Two		
Base Offense Level:	22	U.S.S.G. § 2G2.2(a) (2)
Minor Under 12	+2	U.S.S.G. § 2G2.2(b) (2)
Exchange for Valuable Consideration	+5	U.S.S.G. § 2G2.2(b) (3) (B)
Sadistic Images	+4	U.S.S.G. § 2G2.2(b) (4)
Use of Computer or Interactive Computer Service	+2	U.S.S.G. § 2G2.2(b) (6)

Defendant and the USAO reserve the right to argue that additional specific offense characteristics, adjustments, and departures under the Sentencing Guidelines are appropriate.

21. Defendant understands that there is no agreement as to defendant's criminal history or criminal history category.

22. Defendant and the USAO reserve the right to argue for a sentence outside the sentencing range established by the Sentencing Guidelines based on the factors set forth in 18 U.S.C. § 3553(a) (1), (a) (2), (a) (3), (a) (6), and (a) (7).

WAIVER OF CONSTITUTIONAL RIGHTS

23. Defendant understands that by pleading guilty, defendant gives up the following rights:

1 a. The right to persist in a plea of not guilty.

2 b. The right to a speedy and public trial by jury.

3 c. The right to be represented by counsel -- and if
4 necessary have the Court appoint counsel -- at trial. Defendant
5 understands, however, that, defendant retains the right to be
6 represented by counsel -- and if necessary have the Court appoint
7 counsel -- at every other stage of the proceeding.

8 d. The right to be presumed innocent and to have the
9 burden of proof placed on the government to prove defendant guilty
10 beyond a reasonable doubt.

11 e. The right to confront and cross-examine witnesses
12 against defendant.

13 f. The right to testify and to present evidence in
14 opposition to the charges, including the right to compel the
15 attendance of witnesses to testify.

16 g. The right not to be compelled to testify, and, if
17 defendant chose not to testify or present evidence, to have that
18 choice not be used against defendant.

19 h. Any and all rights to pursue any affirmative defenses,
20 Fourth Amendment or Fifth Amendment claims, and other pretrial
21 motions that have been filed or could be filed.

22 WAIVER OF RETURN OF DIGITAL DATA

23 24. Understanding that the government has in its possession
24 digital devices and/or digital media seized from defendant, defendant
25 waives any right to the return of digital data contained on those
26 digital devices and/or digital media and agrees that if any of these
27 digital devices and/or digital media are returned to defendant, the
28

1 government may delete all digital data from those digital devices
2 and/or digital media before they are returned to defendant.

3 WAIVER OF APPEAL OF CONVICTION

4 25. Defendant understands that, with the exception of an appeal
5 based on a claim that defendant's guilty plea was involuntary, by
6 pleading guilty defendant is waiving and giving up any right to
7 appeal defendant's convictions on the offenses to which defendant is
8 pleading guilty. Defendant understands that this waiver includes,
9 but is not limited to, arguments that the statute to which defendant
10 is pleading guilty is unconstitutional, and any and all claims that
11 the statement of facts provided herein is insufficient to support
12 defendant's pleas of guilty.

13 LIMITED MUTUAL WAIVER OF APPEAL OF SENTENCE AND COLLATERAL ATTACK

14 26. Defendant agrees that, provided the Court imposes a total
15 term of imprisonment on all counts of conviction of no more than 20
16 years' imprisonment, defendant gives up the right to appeal all of
17 the following: (a) the procedures and calculations used to determine
18 and impose any portion of the sentence; (b) the term of imprisonment
19 imposed by the Court; (c) the fine imposed by the Court, provided it
20 is within the statutory maximum; (d) to the extent permitted by law,
21 the constitutionality or legality of defendant's sentence, provided
22 it is within the statutory maximum; (e) the amount and terms of any
23 restitution order; (f) the term of probation or supervised release
24 imposed by the Court, provided it is within the statutory maximum;
25 and (g) any of the conditions of probation or supervised release
26 imposed by the Court.

27 27. Defendant also gives up any right to bring a post-
28 conviction collateral attack on the conviction or sentence, including

1 any order of restitution, except a post-conviction collateral attack
2 based on a claim of ineffective assistance of counsel, a claim of
3 newly discovered evidence, or an explicitly retroactive change in the
4 applicable Sentencing Guidelines, sentencing statutes, or statutes of
5 conviction. Defendant understands that this waiver includes, but is
6 not limited to, arguments that the statute to which defendant is
7 pleading guilty is unconstitutional, and any and all claims that the
8 statement of facts provided herein is insufficient to support
9 defendant's pleas of guilty.

10 28. The USAO agrees that, provided all portions of the sentence
11 are at or above the statutory minimum and at or below the statutory
12 maximum specified above, the USAO gives up its right to appeal any
13 portion of the sentence.

14 RESULT OF WITHDRAWAL OF GUILTY PLEA

15 29. Defendant agrees that if, after entering a guilty plea
16 pursuant to this agreement, defendant seeks to withdraw and succeeds
17 in withdrawing defendant's guilty plea on any basis other than a
18 claim and finding that entry into this plea agreement was
19 involuntary, then the USAO will be relieved of all of its obligations
20 under this agreement.

21 RESULT OF VACATUR, REVERSAL OR SET-ASIDE

22 30. Defendant agrees that if any count of conviction is
23 vacated, reversed, or set aside, the USAO may: (a) ask the Court to
24 resentence defendant on any remaining count of conviction, with both
25 the USAO and defendant being released from any stipulations regarding
26 sentencing contained in this agreement, (b) ask the Court to void the
27 entire plea agreement and vacate defendant's guilty plea on any
28 remaining count of conviction, with both the USAO and defendant being

1 released from all their obligations under this agreement, or
2 (c) leave defendant's remaining conviction, sentence, and plea
3 agreement intact. Defendant agrees that the choice among these three
4 options rests in the exclusive discretion of the USAO.

5 EFFECTIVE DATE OF AGREEMENT

6 31. This agreement is effective upon signature and execution of
7 all required certifications by defendant, defendant's counsel, and an
8 Assistant United States Attorney.

9 BREACH OF AGREEMENT

10 32. Defendant agrees that if defendant, at any time after the
11 signature of this agreement and execution of all required
12 certifications by defendant, defendant's counsel, and an Assistant
13 United States Attorney, knowingly violates or fails to perform any of
14 defendant's obligations under this agreement ("a breach"), the USAO
15 may declare this agreement breached. All of defendant's obligations
16 are material, a single breach of this agreement is sufficient for the
17 USAO to declare a breach, and defendant shall not be deemed to have
18 cured a breach without the express agreement of the USAO in writing.
19 If the USAO declares this agreement breached, and the Court finds
20 such a breach to have occurred, then: (a) if defendant has previously
21 entered a guilty plea pursuant to this agreement, defendant will not
22 be able to withdraw the guilty plea, and (b) the USAO will be
23 relieved of all its obligations under this agreement.

24 COURT AND UNITED STATES PROBATION AND PRETRIAL SERVICES

25 OFFICE NOT PARTIES

26 33. Defendant understands that the Court and the United States
27 Probation and Pretrial Services Office are not parties to this
28 agreement and need not accept any of the USAO's sentencing

1 recommendations or the parties' agreements to facts or sentencing
2 factors.

3 34. Defendant understands that both defendant and the USAO are
4 free to: (a) supplement the facts by supplying relevant information
5 to the United States Probation and Pretrial Services Office and the
6 Court, (b) correct any and all factual misstatements relating to the
7 Court's Sentencing Guidelines calculations and determination of
8 sentence, and (c) argue on appeal and collateral review that the
9 Court's Sentencing Guidelines calculations and the sentence it
10 chooses to impose are not error, although each party agrees to
11 maintain its view that the calculations set forth above are
12 consistent with the facts of this case. While this paragraph permits
13 both the USAO and defendant to submit full and complete factual
14 information to the United States Probation and Pretrial Services
15 Office and the Court, even if that factual information may be viewed
16 as inconsistent with the facts agreed to in this agreement, this
17 paragraph does not affect defendant's and the USAO's obligations not
18 to contest the facts agreed to in this agreement.

19 35. Defendant understands that even if the Court ignores any
20 sentencing recommendation, finds facts or reaches conclusions
21 different from those agreed to, and/or imposes any sentence up to the
22 maximum established by statute, defendant cannot, for that reason,
23 withdraw defendant's guilty plea, and defendant will remain bound to
24 fulfill all defendant's obligations under this agreement. Defendant
25 understands that no one -- not the prosecutor, defendant's attorney,
26 or the Court -- can make a binding prediction or promise regarding
27 the sentence defendant will receive, except that it will be between
28 the statutory mandatory minimum and the statutory maximum.

NO ADDITIONAL AGREEMENTS

36. Defendant understands that, except as set forth herein, there are no promises, understandings, or agreements between the USAO and defendant or defendant's attorney, and that no additional promise, understanding, or agreement may be entered into unless in a writing signed by all parties or on the record in court.

//

//

PLEA AGREEMENT PART OF THE GUILTY PLEA HEARING

37. The parties agree that this agreement will be considered part of the record of defendant's guilty plea hearing as if the entire agreement had been read into the record of the proceeding.

AGREED AND ACCEPTED

UNITED STATES ATTORNEY'S OFFICE
FOR THE CENTRAL DISTRICT OF
CALIFORNIA

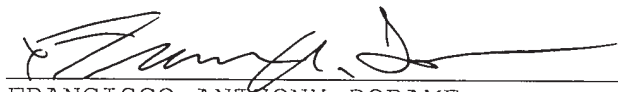
STEPHANIE S. CHRISTENSEN
Acting United States Attorney



September 15, 2022

KATHY YU
SCOTT LARA
Assistant United States Attorneys

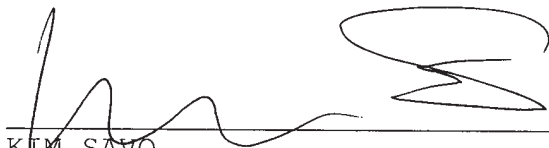
Date



FRANCISCO ANTHONY DORAME
Defendant

Date

9-15-22



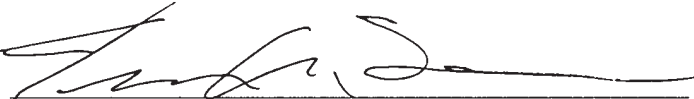
KIM SAVO
Attorney for Defendant FRANCISCO
ANTHONY DORAME

Date

9/15/22

CERTIFICATION OF DEFENDANT

I have read this agreement in its entirety. I have had enough time to review and consider this agreement, and I have carefully and thoroughly discussed every part of it with my attorney. I understand the terms of this agreement, and I voluntarily agree to those terms. I have discussed the evidence with my attorney, and my attorney has advised me of my rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. No promises, inducements, or representations of any kind have been made to me other than those contained in this agreement. No one has threatened or forced me in any way to enter into this agreement. I am satisfied with the representation of my attorney in this matter, and I am pleading guilty because I am guilty of the charge and wish to take advantage of the promises set forth in this agreement, and not for any other reason.



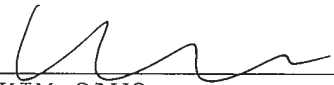
FRANCISCO ANTHONY DORAME
Defendant



Date

CERTIFICATION OF DEFENDANT'S ATTORNEY

I am FRANCISCO ANTHONY DORAME's attorney. I have carefully and thoroughly discussed every part of this agreement with my client. Further, I have fully advised my client of his rights, of possible pretrial motions that might be filed, of possible defenses that might be asserted either prior to or at trial, of the sentencing factors set forth in 18 U.S.C. § 3553(a), of relevant Sentencing Guidelines provisions, and of the consequences of entering into this agreement. To my knowledge: no promises, inducements, or representations of any kind have been made to my client other than those contained in this agreement; no one has threatened or forced my client in any way to enter into this agreement; my client's decision to enter into this agreement is an informed and voluntary one; and the factual basis set forth in this agreement is sufficient to support my client's entry of guilty pleas pursuant to this agreement.



KIM SAVO
Attorney for Defendant FRANCISCO
ANTHONY DORAME

Date

9/15/22